

Date: May 5, 2008

B - 19J

Superintendent
Pipestone National Monument
36 Reservation Avenue
Pipestone, Minnesota 56164-1269

Re: Comments on the Final Environmental Impact Statement for the Pipestone National Monument General Management Plan, Pipestone County, Minnesota, CEQ No. 20070091

Dear Superintendent:

In accordance with United States Environmental Protection Agency (EPA) responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Final Environmental Impact Statement (FEIS) for the Pipestone National Monument (PNM) General Management Plan.

The National Park Service (NPS) is developing a General Management Plan to guide future decisions regarding this unique Minnesota resource. EPA commented on the draft Environmental Impact Statement (DEIS) in a letter of May 15, 2007, indicating a number of concerns and recommendations. Our concerns included stormwater, wastewater, surface water quality, invasive species, land use, and noise. Our recommendations included: 1) possible acquisition of the Indian School Superintendent's House and lands; 2) restoring prairie as the preferred alternative; 3) establishment of buffer areas on the west, south and east sides of the park boundaries; and 4) parameters for trail reconstruction. Alternatives presented in this FEIS include a No-Action "baseline," the environmentally Preferred Alternative with restoration of the prairie as Alternative #1, modifications to the existing buildings and operations as Alternative #2, and a limited blend of these two plans as Alternative #3.

We now concur with the selection of Alternative #1, restoration of the natural prairie habitat, as the Preferred Alternative. Steps proposed to reduce both Native American and general public visitor degradation of park resources are additional positive elements. We note the incorporation of lower impact overlook vistas from the proposed new entrance and trailhead and new County Route 67 western overlook. We understand that several unresolved options could affect the Indian School Superintendent's House, which preclude specifying a final outcome for this resource. EPA appreciates the commitments in the preferred alternative to attempt to bring this historical component of the park back into a functional role and thus enhance visitors' learning experiences. We concur with the expansion of the park boundary by

annexing and restoring the 15.3 acre parcel in the northeast corner of the park, a property formerly part of the original Indian School land. The FEIS provides informative discussion on many invasive species issues and their control, including management of the railroad right-of-way. This discussion is very helpful in describing the on-site challenges of addressing invasive species. We support the NPS commitments to aggressively deal with this issue. We recommend that the record of decision (ROD) commit to these improvements and address the following concerns.

Impacts of Off-Site Functions

We recommend in our DEIS comments that the administrative, campground, housing, maintenance, museum, visitor center functions and other operations housed in the prairie space be relocated. The NPS indicated in the FEIS that most of these functions will be shifted off-site. Execution of the plan will involve identifying off-site locations for these functions, and we understand that impacts can not be fully assessed until final locations are determined. We commend the NPS for that decision, but recommend that the environmental impacts of moving those functions off-site be discussed in the ROD. This should include commitments to smart growth and green building principles for these moves, and the several new on-site constructions and trail reconstructions.

Protection of a buffer zone along the west, south and east boundaries of the park

Both the DEIS and this FEIS mention growing concerns from development of neighboring properties surrounding the PNM. While the alternatives all address the bordering state lands to the north and the 15.3 acre parcel in the northeast area, impacts to the west, south and east sides are only acknowledged as ongoing and that the PNM will continue to participate in local conversations of such issues. Given the importance and uniqueness of the PNM to the local economy, and state and national history, as well as its sacredness to multiple tribal groups, the ROD should specify how the NPS plans to work within local and state governments to protect PNM from potential incompatible land uses, such as industrial or commercial development. The ROD should discuss approaches, such as overlay zoning, protective easements, natural vista protective restrictions, and better enforcement of runoff controls in upstream farming operations to meet newly established total maximum daily load limits (TMDL) for the Pipestone Creek.

Noise pollution from quarry pumps, traffic and wind turbines

The PNM is a sacred site for tribal cultures who find great significance in and seek the solace of silence. Park user experience is stated as a concern for this FEIS, but quarrying and pumping were listed as issues not addressed. Since one aspect of prairie is its soft sounds, the ROD should address noise as an appropriate park management planning issue, either by mitigating pump noise or by managing the quarry without pumping.

We again commend the NPS for your extensive efforts in reaching out to tribal stakeholders, and renew our encouragement to actively participate in local land use processes that impact the Pipestone Monument.

We are in overall agreement with the FEIS and encouraged by the directions it proposes for management of this national resource. Several issues are identified that should be addressed in the ROD. Please send us the ROD when it is issued.

We appreciate the opportunity to review and comment on this FEIS for the Pipestone General Management Plan. We welcome questions concerning alternatives suggested in our comments. Please feel free to contact me or Norm West of my staff at 312-353-5692 or west.norman@epa.gov.

Sincerely,

/S/ Anna Miller for-

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance